

**To:** Rao, Kate[Rao.kate@epa.gov]  
**Cc:** Albright, David[Albright.David@epa.gov]; Mark Nelson[mnelson@horsleywitten.com]; Geraldine Camilli[gcamilli@horsleywitten.com]  
**From:** Jim Walker  
**Sent:** Tue 9/16/2014 5:35:25 PM  
**Subject:** Fw: Panel discussion on fracking  
ANTERRA VIOLATION-PV14-0016 NOV (1).pdf

Hi Kate,

I received the email below from Kit Stolz this morning, I can answer his questions in a general sense, but not sure that I should given that the subject matter relates in part to the content of the Horsley Witten CDOGGR Report. What are your thoughts?

The violation relates to exceeding the number of trucks allowed at the site each day by the County permit, not the operation of the disposal wells.

Thank you,  
Jim

**From:** Kit Stolz  
**Sent:** Tuesday, September 16, 2014 12:44 AM  
**To:** Jim Walker  
**Subject:** Re: Panel discussion on fracking

Hi Jim,

I have tried to talk to DOGGR, but haven't heard back. In the past they have referred me to their spokesperson in Sacramento, who will not answer any specific questions, and only relay policy guidelines. I have looked at well reports at DOGGR re: Anterra, which are interesting but hard to understand.

But that's okay. I don't really have the column inches to go into any serious detail with this story anyhow., I'm just trying to get the outlines right. Let me ask you about a paragraph from your report to the EPA back in 2011. You wrote:

"District 2 currently has one commercial disposal project located in the Oxnard oil field, Ventura County, operated by Anterra Energy Services, Inc. The project is located in a highly visible area and located in close proximity to the Ventura office allowing more frequent inspections of the facilities and day-to-day operations. (The project approval for this operation is attached.) The operator of the facility provides monthly reports of the source, chemical analysis and volumes of materials/fluids accepted at their site."

From reading about District 2, you reported that the District had over 1000 injection wells. Am I right in thinking that most of these injection wells are actually existing oil wells in which produced water and other fluids are reinjected into the field to maintain pressures? (Or is that too simple?) So that if Ventura county has a major beef with Anterra -- as they clearly do, even if the reason for the beef isn't clear -- then if Anterra is forced to reduce intake of oil field related fluids from other wells, that this could potentially impact the cost of oil field operations in the county?

Received the county's notice of violation, and it makes pretty compelling reading, I must say. I've attached it. Here's a relevant passage about Anterra's operation.

Notice of Violation  
PV14-0016  
June 25, 2014

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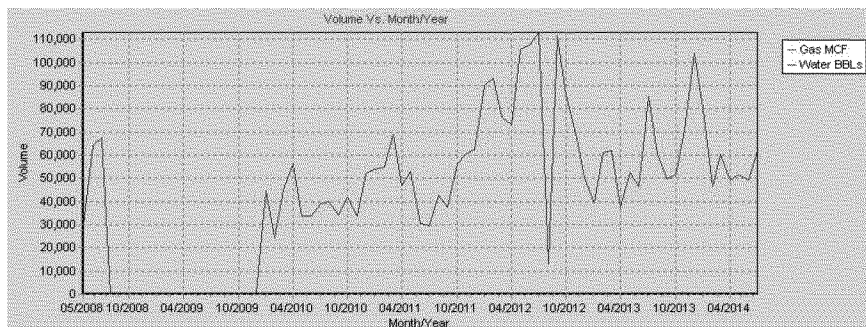
The California Division of Oil and Gas and Geothermal Resources (DOGGR) receives reports of fluid injection volumes for all injection wells operated in the State. These records include the injection volumes for the two disposal wells (Diedrich #2 and Diedrich #5) utilized as part of the Anterra Energy operation. The accounting of truck deliveries for February 2014 provided by you to the County Planning Division discloses that 601 trucks arrived at the Anterra facility in February 2014. According to DOGGR records, the total wastewater volume injected in the Diedrich #2 and Diedrich #5 wells in February 2014 is 63,180 barrels. Thus, the average number of barrels per truck delivery during February 2014 is 105 barrels ( $63,180 / 601 \approx 105$  barrels/truck). This factor would account for the totality of the Anterra operation including truck deliveries of wastewater, truck deliveries of drilling mud, and disposal of wastewater produced from the existing onsite oil well (Diedrich #6). Using the 105 barrel/truck factor and available disposal volume data from DOGGR, the truck deliveries to the Anterra Energy facility for the past several months is calculated in the table below. Note that the maximum number of truck trips allowed by CUP 531-1 shown in the table are based on the number of operational days (non-Sundays) in each month times the limit of 24 truck trip deliveries in any one day.

**Calculation of Anterra's monthly truck volume**

Month	Wastewater injection volume (barrels: DOGGR records)		Total	Barrels per truck factor	Max. # of trucks allowed per CUP 531-1	Number of trucks accepted by Anterra
	Diedrich #2	Diedrich #5				
March 2014	13,580	60,397	73,977	105	624	705
February 2014	16,895	46,285	63,180	105	576	601
January 2014	26,400	80,341	106,741	105	648	1,017
December 2013	19,350	104,141	123,491	105	624	1,176
November 2013	18,407	70,962	89,369	105	624	851

As indicated in the above table, Anterra Energy has violated the truck delivery limits established in CUP 531-1 for every month from November 2013 through March of 2014. This includes the three days in February 2014 that Anterra reported accepting between 33 and 63 trucks at the Anterra facility.

I'm not trying to put you on the spot or even to quote you -- I'm just trying to understand what is going on to report on it accurately. Here's a graph of Anterra #5 from DOGGR:



**This looks to me as if an uptick in oil field operations, such as fracking, has led to a big increase in injection volumes in the one commercial operation in Ventura County. Would that be a fair statement?**

**Thanks for your help. I don't think this is easy stuff to understand.**

**yours,  
Kit  
805-323-6524**

**On Mon, Sep 15, 2014 at 8:08 AM, Jim Walker <[jameswalker5@msn.com](mailto:jameswalker5@msn.com)> wrote:**

**Kit,**

**I wouldn't know what to say about this story since the specifics of the alleged violations are not revealed. If it is a Class II disposal well operation, CDOGGR should be aware of problems at the site and able to provide some information on the alleged violations. I suggest you contact the District 2 DOGGR office in Ventura for more information.**

**Jim Walker**

**From:** [Kit Stolz](#)  
**Sent:** Monday, September 15, 2014 12:02 AM  
**To:** [Jim Walker](#)  
**Subject:** Re: Panel discussion on fracking

Hi Jim,

Thank you for considering the possibility of appearing on the panel. Of course we

accept your decision, if reluctantly, but I do want to bring to your attention a startling news development about Class II injection wells in Ventura County.

This is from just last Thursday, in the *Ventura County Star* (I'll copy and paste the story -- I sometimes write for this paper, although this one they've already assigned..)

OXNARD, Calif. - Investigators from the Ventura County District Attorney's Office converged on the site of a local oil field waste company outside Oxnard on Thursday with search warrants.

Senior Deputy District Attorney Christopher Harman said investigators arrived at Anterra Corp.'s waste disposal site on East Wooley Road outside Oxnard on Thursday morning. The company's headquarters in Santa Paula was also served, he said.

Harman said he could provide no further details about the open investigation of possible criminal violations.

Anterra officials had no prior warning of the searches and had not been interviewed by any agency before the investigators arrived, company attorney Jim Prosser said Thursday.

Prosser said he understands that investigators are looking at company activities in and around July 2013, when Anterra was under different management. He declined to say who was managing the company at that time, saying he didn't know enough about the circumstances and the time period under investigation.

"Current management is taking this seriously. We are doing what is necessary. If there is some issue or some problem, we are going to move to correct it. We don't know the full nature and extent of what the DA is talking about and looking at," Prosser said.

Information technology staff provided the investigators with computer records, he said.

"We said, whatever you want," he said. "We cooperated with their retrieval of records."

The current president, Sally Coleman, declined to comment, referring all questions to Prosser.

Anterra is a private oil field waste management company based in Ventura and Kern counties, according to its website. It has operated in Ventura County since 2001 and has perhaps 45 to 50 employees, Prosser said.

*Reporters Gretchen Wenner and Arlene Martinez contributed to this story.*

Could I ask you a couple of questions about this? A lot seems to go unstated here, and I would like some guidance on how to begin to understand this, and where to look for answers. If you would like to stay out of the story, on background, that would still be helpful for me.

yours truly,

Kit

805-323-6524